

STATE OF SOUTH CAROLINA )

IN THE COURT OF COMMON PLEAS

COUNTY OF GREENVILLE )

Carolyn P. Knight,

Plaintiff,

vs.

Crystal Geyser Roxane, LLC,

Defendant.

2009 JUN 25 A 10:06

2009-CP-23-5348

CLERK OF COURT  
GREENVILLE CO. S.C.  
WICKENSHER

SUMMONS FOR RELIEF  
(Complaint Served)

TO THE DEFENDANT NAMED ABOVE: Crystal Geyser Roxane, LLC

You are hereby summoned and required to answer the Complaint in this action, a copy of which is herewith served upon you, and to serve a copy of your answer to the said Complaint on the subscribers at their offices, 210 S. Main Street, Post Office Box 549, Fountain Inn, South Carolina 29644; within thirty days after the service hereof, exclusive of the date of such service; and if you fail to answer the complaint within the time aforesaid, the Plaintiff in this action will apply to the Court for relief demanded in the Complaint and a judgment by default will be rendered against you for the relief demanded in the Complaint.

IN THE EVENT YOU ARE AN INFANT OVER FOURTEEN YEARS OF AGE OR AN IMPRISONED PERSON, you are further summoned and notified to apply for the appointment of a Guardian Ad Litem to represent you in this action within thirty days after the service hereof, exclusive of the day of such service; and if you fail to answer the Complaint within the time aforesaid, the Plaintiff in this action will apply to the Court for the relief demanded in the Complaint.

IN THE EVENT THAT YOU ARE AN INFANT UNDER FOURTEEN YEARS OF AGE OR ARE INCOMPETENT OR INSANE, then you and the Guardian or Committee are further summoned and notified to apply for the appointment of a Guardian Ad Litem to represent said infant under fourteen years hereof; and if you fail to do so, application for such appointment will be made by the Plaintiff.

YOUNTS, ALFORD, BROWN & GOODSON  
Attorney for Plaintiff

Date: June 18, 2009

BY:

Rodney M. Brown  
S.C. Bar Number 000953  
(864) 862-2528

STATE OF SOUTH CAROLINA ) IN THE COURT OF COMMON PLEAS  
COUNTY OF GREENVILLE )  
Carolyn P. Knight, )  
Plaintiff, )  
vs. )  
Crystal Geyser Roxane, LLC, )  
Defendant. )  
2009-CP-23-5348  
CLERK OF COURT  
GREENVILLE CO. S.C.  
JULY 25 10:06 AM

The Plaintiff would allege unto this Court as follows:

1. The Plaintiff is a citizen and resident of the County and State aforesaid.
2. The Defendant sells and distributes bottled water.
3. One of the bottled waters that they carry and distribute is Clover Valley Natural Spring.
4. On November 7, 2008, the Plaintiff went to a Dollar General Store on Main Street in Fountain Inn, South Carolina. She purchased a 15-pack of Clover Valley Natural Spring bottled water.
5. She went home and drank it and got sick.
6. As a direct and proximate result of ingesting this, she has become ill necessitating doctors' visits and incurring damages. All of her damages are a direct and proximate result of ingesting a bottle of water distributed by the Defendant which contained a foreign object and chemicals in it.
7. The Plaintiff has received physical injury and damages including but not limited to medical expenses, pain and suffering, permanent impairment, loss of use of her voice and other damages.

8. The Defendant is liable for preparing and distributing a bottle of water with a foreign object in it.

#### SECOND CAUSE OF ACTION

9. The allegations contained above are rewritten and realleged herein.

10. The Defendant was negligent, grossly negligent, willful or wanton in one or more of the following particulars:

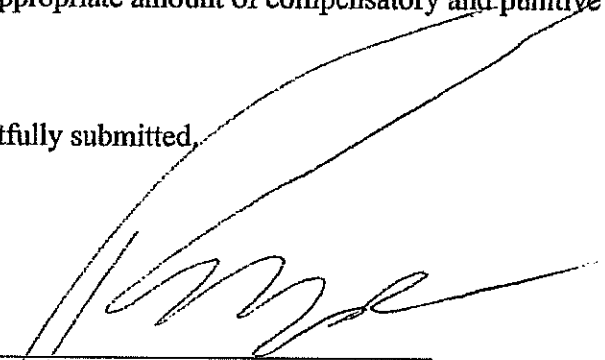
- a. In producing a bottle of water with a foreign object in it;
  - b. In failing to inspect the water properly before it left the control of the Defendant;
  - c. In allowing a foreign object to be placed into it during the bottling stage;
  - d. In failing to have a proper quality control system in place to determine foreign objects in the bottles;
  - e. In failing to take proper care to prepare and distribute the bottles of water;
- all in violation of the statutory and common laws of the State of South Carolina.

11. As a direct and proximate result of the negligence, gross negligence, willfulness or wantonness of the Defendant, the Plaintiff has incurred the damages enumerated above.

12. The Plaintiff requests an amount of compensatory and punitive damages in an amount to be determined by a jury as just and fair.

WHEREFORE, the Plaintiff prays for a judgment against the Defendant and would ask the jury to determine the appropriate amount of compensatory and punitive damages to be awarded to her.

Respectfully submitted,



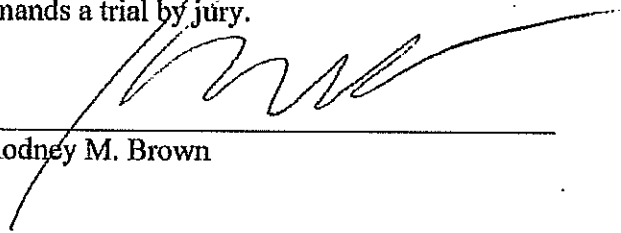
---

Rodney M. Brown, S.C. Bar #000953  
Attorney for Plaintiff  
Younts, Alford, Brown & Goodson  
P.O. Box 549 – 210 S. Main Street  
Fountain Inn, South Carolina 29644  
(864) 862-2528

June 18, 2009

JURY DEMAND

The Plaintiff hereby demands a trial by jury.



---

Rodney M. Brown